

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,	§ § §
Plaintiff,	§ § §
v.	§ Case No. 1:18-CV-04309-PKC-KHP
FRANCISCO ABELLAN VILLENA, GUILLERMO CIUPIAK, JAMES B. PANTHER, and FAIYEZ DEAN,	§ § § §
Defendants.	§

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**UNITED STATES OF AMERICA'S NOTICE OF MOTION TO SEAL**

The United States of America (the “Government”), by and through its undersigned attorneys intends to file a second motion to stay in the above-captioned proceeding. In advance of filing said motion, the Government hereby moves that this Court for an order:

- (1) providing that the Notice of Motion to Stay Proceedings, the accompanying motion and memorandum of law, and the accompanying proposed order be filed under seal, until further order of the Court;
- (2) providing that the accompanying declaration of Assistant Chief Tracee Plowell be submitted *ex parte* and under seal, until further order of the Court; and
- (3) providing that any order filed by the Court responsive to the aforementioned submissions be filed under seal, until further order of this Court.

Dated: April 29, 2019

Respectfully submitted,

ROBERT ZINK  
Acting Chief, Fraud Section

BY: /s/ Tracee Plowell  
Tracee Plowell, Assistant Chief  
Michelle Pascucci, Trial Attorney  
Criminal Division, Fraud Section  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 29, 2019, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send notification to counsel of record.

Respectfully submitted,

ROBERT ZINK  
Acting Chief, Fraud Section

BY: /s/  
TRACEE PLOWELL  
Assistant Chief  
Criminal Division, Fraud Section  
United States Department of Justice